

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

RONALD GAUTREAU,  
Plaintiff

vs.

HOPKINTON PUBLIC SCHOOL  
DISTRICT, CATHY MACLEOD,  
ROBERT BERLO, ANN MARIE  
DiMELLO and ALAN KELLER,  
Defendants

CA. No. 16-10017

**DEFENDANTS HOPKINTON PUBLIC SCHOOL DISTRICT, CATHY MACLEOD,  
ROBERT BERLO, ANN MARIE DIMELLO<sup>1</sup> AND ALAN KELLER'S NOTICE OF  
REMOVAL**

NOW COME the defendants Hopkinton Public School District, Cathy MacLeod, Robert Berlo, Ann Marie DiMello (correctly known as Dr. Mary Ann DeMello) and Alan Keller (herein "defendants") in the above-entitled cause, and respectfully show to the Court:

1. The above action has been brought in the Worcester Superior Court and is now pending therein. Said action was initially commenced in the Massachusetts Commission Against Discrimination in March 2015. The plaintiff, Ronald Gautreau withdrew the matter and commenced the within action in the Worcester Superior Court on December 2, 2015, the defendants were served on December 22, 2015, and the time for filing of this notice has not expired.
2. Said action is of a civil nature and involves diversity of citizenship with an amount in controversy allegedly exceeding \$75,000.
3. The nature of the controversy between the plaintiff and said petitioners is as follows: said plaintiff, a former Engineering and Technology teacher in the Hopkinton Middle School alleges that the Hopkinton Public Schools discriminated against him on a number of occasions on the basis of his age, eventually resulting in the alleged constructive discharge of the plaintiff.
4. The matter in controversy between the plaintiffs and defendants involves diversity of citizenship.

WHEREFORE the petitioners pray that this cause be removed from said state court to this Honorable Court as provided by law.

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<sup>1</sup> The correct name of the former Assistant Superintendent of the Hopkinton Public Schools is Dr. Mary Ann DeMello.

DEFENDANTS,  
HOPKINTON PUBLIC SCHOOL DISTRICT,  
CATHY MACLEOD, ROBERT BERLO, ANN  
MARIE DIMELLO and ALAN KELLER,

/s/ Courtney E. Mayo

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January 7, 2016

## **CERTIFICATE OF SERVICE**

I, Courtney E. Mayo, counsel of record for the defendants Hopkinton Public Schools, Cathy MacLeod, Robert Berlo, Dr. Mary Ann DeMello and Alan Keller in this action, do hereby certify that I have served a copy of the foregoing Notice of Removal, to all parties, by first class mail, postage prepaid and by email, this 7<sup>th</sup> day of January 2016, to:

John M. Wozniak, Esquire  
The Wozniak Law Group, P.C.  
159 Hartford Avenue East  
Mendon, MA 01756  
[AttyWozniak@comcast.net](mailto:AttyWozniak@comcast.net)

/s/Courtney E. Mayo  
Courtney E. Mayo, Esquire